

Eric B. Myers, SBN 8588
Sarah Grossman-Swenson, SBN 11979
MCCRACKEN, STEMERMAN & HOLSBERRY, LLP
1630 S. Commerce Street, Suite A-1
Las Vegas, NV 89102
Telephone: (702) 386-5107
Facsimile: (702) 386-9848
Email: ebm@msh.law
sgs@msh.law

Attorneys for Plaintiffs Jonathan Hill and Phillip Rowton

PAUL T. TRIMMER, ESO.

ROSE W. HAWKINS,
Nevada Bar No. 9291

THOMAS W. MARONEY, ESQ.

Nevada Bar No.13913

JACKSON LEWIS P.C.

300 S. Fourth Street, Suite 900

Las Vegas, Nevada 89101

Telephone: (702) 921-2460

Facsimile: (702) 921-2461

Email: paul.trimmer@jacksonlewis.com

*Attorneys for Defendant
Amentum Services, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JONATHON HILL, an individual, and
PHILLIP ROWTON, an individual,

Case No. 2:23-cv-01750-MMD-BNW

Plaintiffs,

vs.

AMENTUM SERVICES, INC., and Does 1-10,

Defendants.

**STIPULATION AND ORDER TO
EXTEND TIME FOR DISCOVERY**

(FIRST REQUEST)

Defendant Amentum Services, Inc, (“Defendant”) by and through its counsel, the law firm of Jackson Lewis P.C., and Plaintiffs Jonathon Hill and Phillip Rowton (“Plaintiffs”), by and through their counsel, McCracken, Stemerman & Holsberry, LLP, hereby stipulate and agree to extend the deadline to complete discovery **to October 30, 2024**. This Stipulation is submitted and based upon the following:

1. On October 27, 2023, Plaintiffs filed a Complaint naming Amentum Services, Inc, as Defendant.

1 2. On October 31, 2023, Plaintiffs served Defendant with a copy of the Summons and
2 Complaint.

3 3. On January 5, 2024, Defendant filed its Motion to Dismiss Plaintiff's Complaint.

4 4. On April 1, 2024, the Court denied Defendant's Motion to Dismiss. ECF No. 14.
5 The Court gave the Parties 180 days to complete discovery, to Saturday, September 28, 2024
6 (September 30, 2024).

7 5. Amentum's counsel was injury shortly thereafter, requiring an extension of time to
8 answer the complaint. Pursuant to stipulation, Defendant answered on May 1, 2024.

9 6. Pursuant to Local Rule 26-3, the Parties submit the following statements:

10 a. **Discovery completed:** The Parties timely completed initial disclosures, and
11 they have served written discovery requests on each other, including requests
12 for production of documents and interrogatories. They have provided
13 extensions on discovery deadlines due to the schedules of counsel.
14 Defendants responded to Plaintiffs' discovery on August 12, 2024, and
15 Plaintiffs' responses are due on September 14, 2024.

16 b. **Discovery that remains to be completed:** The Parties need additional time
17 to meet and confer regarding the discovery responses and to take depositions.
18 Plaintiffs intend to depose Defendant's 30(b)(6) representative, and
19 Defendant intends to depose Plaintiffs. The Parties are negotiating
20 deposition dates.

21 c. **Reasons why deadline was not completed:** The Parties have been working
22 diligently to obtain discovery and additional time is needed to complete
23 discovery prior to September 28, 2024, due to the schedules of the parties
24 and counsel in September.

25 d. **Proposed schedule:**

26 i. Discovery cut-off of **October 30, 2024**
27 ii. Written discovery completed by September 14, 2024
28 iii. Depositions completed by October 14, 2024
29 iv. Follow-up completed by October 28, 2024

1 7. This is the first request for an extension of time to complete discovery and is made
2 more than 21 days in advance of the current discovery cut-off on September 28, 2024.

3 8. This request is made in good faith and not for the purpose of delay. The Parties
4 have been working diligently to obtain discovery and additional time is needed to complete
5 discovery due to the schedules of the parties and counsel.

6
7 DATED this 28th day of August, 2024.

8 McCracken, Stemerman & Holsberry, LLP

9 JACKSON LEWIS P.C.

10 */s/ Sarah Grossman-Swenson*
11 Sarah Grossman-Swenson, SBN 11979
12 1630 S. Commerce Street, Suite A-1
13 Las Vegas, NV 89102
14 Email: sgs@msh.law

15 */s/ Paul Trimmer*
16 PAUL T. TRIMMER, ESQ.
17 Nevada Bar No. 9291
18 THOMAS W. MARONEY, ESQ.
19 Nevada Bar No. 13913
20 300 S. Fourth Street, Suite 900
21 Las Vegas, Nevada 89101

22 *Attorneys for Plaintiffs*

23 *Attorneys for Defendant*

24 **ORDER**

25 IT IS SO ORDERED:

26 
27 _____
28 UNITED STATES MAGISTRATE JUDGE

29 Dated: August 29, 2024